

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ANDREW LECHTER; SYLVIA  
THOMPSON; LAWSON F. THOMPSON;  
RUSSELL DALBA; and KATHRYN  
DALBA, on behalf of themselves and all  
other similarly situated,

Plaintiffs,

v.

APRIO, LLP f/k/a HABIF, AROGETI &  
WYNNE, LLP, ET AL.,

Defendants.

CIVIL ACTION FILE  
NO. 1:20-cv-01325-AT

**DEFENDANT GEORGIA-ALABAMA LAND TRUST, INC.’S  
MOTION TO DISMISS PLAINTIFFS’ FIRST AMENDED COMPLAINT**

COMES NOW, GEORGIA-ALABAMA LAND TRUST, INC. (“GALT”), and moves this Court pursuant to Fed. R. Civ. Proc. 12(b) to dismiss all claims asserted against it in Plaintiffs’ First Amended Class Action Complaint. [Doc. 155]. Plaintiffs have failed to state a claim upon which relief can be granted and cannot prevail on the merits of their claims. In support of this motion, GALT relies on the arguments and citations to authority presented in the accompanying memorandum of law, as well as the attached exhibits. For the reasons more fully set forth in the accompanying memorandum, GALT’s motion should be granted, and this Court should enter

judgment in favor of GALT and dismiss all causes of action asserted in Plaintiffs' First Amended Class Action Complaint against GALT with prejudice.

This 16th day of October, 2020.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically submitted the foregoing **DEFENDANT GEORGIA-ALABAMA LAND TRUST, INC.'S MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT** to the Clerk of Court using the CM/ECF *e-filing* system which will automatically send electronic mail notification of such filing to the following counsel of record:

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